

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MELISSA KAYE,

Plaintiff,

-against-

NEW YORK CITY HEALTH AND HOSPITALS
CORPORATION; ELIZABETH FORD; PATRICIA
YANG; ABHISHEK JAIN; and JONATHAN
WANGEL (said names being fictitious, the persons
intended being those who aided and abetted the
unlawful conduct of the names Defendants),

Defendants.
-----X

**DEFENDANTS'
RESPONSE TO
PLAINTIFF'S
COUNTERSTATEMENT
OF DISPUTED FACTS**

18 Civ. 12137 (JPC)(JCC)

Pursuant to Local Rule 56.1 of the Civil Rules of this Court, Defendants, New York City Health and Hospitals Corporation, Elizabeth Ford, Patricia Yang, Abhishek Jain, and Jonathan Wangel submit their response to Plaintiff's statement of an additional factual allegations:

I. Background

A. Dr. Kaye's Background

1. Throughout the course of her employment, Dr. Kaye was more qualified than Dr. Steve Ciric and the other male Directors of the Forensic Psychiatric Court Clinics. Dr. [sic] obtained her medical degree from the Medical College of Pennsylvania. She is a triple board certified Psychiatrist with certifications in the following specialties: General Psychiatry; Forensic Psychiatry; and Child & Adolescent Psychiatry. She had more directly applicable experience in Court Ordered forensic psychiatric evaluations, she had the most seniority of all of the evaluators and directors at the clinic.

- Exhibit 1: Dr. Kaye's CV NYC2541-NYC2544; and
- Exhibit 2: Dr. Kaye's Decl..

Defendants' Response: The cited evidence does not support plaintiff's statement of fact.

Dated: New York, New York
May 16, 2022

SYLVIA O. HINDS-RADIX
Corporation Counsel of the City of New York
Attorney for Defendants
100 Church Street, Room 2-124
New York, New York 10007
(212) 356-2461

By: ECF /s/
Donna A. Canfield
Assistant Corporation Counsel
dcanfiel@law.nyc.gov